

SETON HALL UNIVERSITY SCHOOL OF LAW
SETTLEMENT CONFERENCE ADVOCACY PROGRAM
One Newark Center, Office 428
Newark, New Jersey 07102



July 23, 2025

Via Electronic Case Filing

Hon. Andre M. Espinosa, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Building & U.S. Courthouse
50 Walnut Street, Room 2037
Newark, New Jersey 07102

Re: Second Request to Adjourn Telephonic Status Conference
Figueroa, et al. v. NJ Department of Corrections, et al., 2:24-cv-07781 (SDW)(AME)

Your Honor:

By appointment of the Court, the Seton Hall University School of Law Settlement Conference Advocacy Program (“Seton Hall”) represents 23 currently or formerly incarcerated plaintiffs in the above-captioned matter for the limited and exclusive purpose of court-annexed settlement.

Upon information and belief, plaintiffs currently reside at six (6) correctional facilities. Upon review of the docket, it appears that six (6) additional inmates have constructively moved the Court to be joined as plaintiffs to the litigation.¹ As of this writing, the Court appears not to have ruled on those applications.

On June 18, 2025, Seton Hall informed the Court of its collaborative efforts with defense counsel to design a process of client communication which both ensures correction officer safety and fosters efficient time management. Since that correspondence, Seton Hall continues to work with New Jersey Department of Corrections Legal Specialist Edward H. Haas, Esq. and is grateful for such assistance.

Though we have made progress, it is our collective opinion that there would be little to discuss with the Court at this time.

By text order entered June 20, 2025, the Court calendared a telephonic status conference to commence at 3:00pm on Thursday, July 24, 2025. *See* Dockey Entry #82. Counsel for all parties jointly request a second adjournment of that conference to afford additional time in which to speak with the plaintiffs regarding Seton Hall’s limited-scope, *pro bono* legal services. It is our consensus that a 45-day adjournment would be adequate.

We do not anticipate the need to make another request for adjournment.

¹ *See* Docket Entry #39 (November 13, 2024); Docket Entry #66 (April 21, 2025); Docket Entry #74 (May 20, 2025); Docket Entry #76 (May 27, 2025); Docket Entry #77 (June 2, 2025); and Docket Entry #79 (June 5, 2025).

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Counsel for all parties thank the Court for its consideration of this application.

Respectfully submitted,

/s/ David Michael White
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Seton Hall School of Law
Settlement Conference Advocacy Program

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